

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

VERNETTE WALKER,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 06-138-MPT
)	
THE NEWS JOURNAL and)	
ANN HINES,)	
)	
Defendants.)	

DEFENDANTS' FIRST SET OF REQUESTS FOR ADMISSION TO PLAINTIFF

In accordance with Rule 36(a) of the Federal Rules of Civil Procedure, Defendants The News Journal and Ann Hines ("Ms. Hines") request that Plaintiff Vernetta Walker admit or deny the following Requests for Admission ("Requests").

DEFINITIONS AND INSTRUCTIONS

- A. The form of the responses to Defendants' requests for admission shall comply with Federal Rule of Civil Procedure Rule 36(a).
- B. Defendants' requests for admission shall be deemed to seek a response as of the date it is served and to be continuing. Any additional responsive information, documents or things that become known to Plaintiff or her counsel up to and including the time of trial shall be furnished to Defendants within a reasonable time after such information becomes known. Moreover, if Plaintiff or her counsel acquire any information, documents or things that require an answer to be enlarged, diminished, or otherwise modified, such information, documents or things shall be supplied to Defendants within a reasonable time after they are acquired.

REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 1

Admit that the document attached was written by you. (See Exhibit A).

RESPONSE:

REQUEST FOR ADMISSION NO. 2

Admit that you provided and/or wrote this letter to the attorney(s) in handling your claim against State Farm in regards to your 2004 car accident. (See Exhibit A).

RESPONSE:



Jennifer C. Jauffret (#3689)

Jauffret@rlf.com

Lori A. Brewington (#4522)

Brewington@rlf.com

Richards, Layton & Finger

One Rodney Square

P. O. Box 551

Wilmington, Delaware 19899

(302) 651-7700

Attorneys for Defendant

Dated: September 7, 2007

EXHIBIT A



3-31-2004 10:42 AM WALKER

302 324 1012

P.01

Mr. Fridlin

1 of 3

I spoke to Ann Hines
8/25/04. She ask Me if I could
return to work 8/30/04. I explained
to her I was scheduled for an
injection 8/30/04. She said okay
Call Me by Tuesday 9/1/04. I
Called Ann this morning 9/1/04.
She asked how I was doing, I
Stated Sore. She responded she
just wanted to know how I was
+ to Call her when I can
return to work. My Daughter Came
in the door + handed me this
UPS envelope. Inside was this
letter of termination. I also told Ann
8/25/04 I could not call until 9/1/04 because
the injections are painful.

Please Call me

Verneke Walker
29 Richard Rd
New Castle, DE 19720
302-324-9175